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IN THE UNITED STATES DISTRICT COURT FOR **RECEIVED**  
THE MIDDLE DISTRICT OF ALABAMA

2008 APR -2 A 10:01

WILLIE JAMES CLEMONS, JR.Full name and prison name of  
Plaintiff(s)

v.

HERBIE JohnsonNURSE PAULA% MATTHEWC/o NewcombName of person(s) who violated your  
constitutional rights. (List the names  
of all the person.)DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

2008 CV-243-WHA

CIVIL ACTION NO.

(To be supplied by Clerk of U.S. District  
Court)

## I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES  No

B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES  NO

C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) Willie James Clemons, JRDefendant(s) Herbie Johnson, DR. Bates, Nurse Paula  
Corp. Patton, Nurse Green

2. Court (if federal court, name the district; if state court, name the county)

MIDDLE

3. Docket number 2:08-CV-160-WKW

4. Name of judge to whom case was assigned HON. TERRY F. MOORE

5. Disposition (for example: was the case dismissed? Was it appealed? Is it still pending?) Pending

6. Approximate date of filing lawsuit 3/11/2008

7. Approximate date of disposition Pending

II. PLACE OF PRESENT CONFINEMENT Autauga County Jail

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED Autauga County Jail

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

|    | NAME                               | ADDRESS                             |
|----|------------------------------------|-------------------------------------|
| 1. | <u>Herbie Johnson</u>              | <u>136 N. COURT ST, Prattville,</u> |
| 2. | <u>NURSE PAULA —</u>               | <u>AIA 36067</u>                    |
| 3. | <u>% MATTHEWS</u>                  | <u>"</u>                            |
| 4. | <u>% <del>Herbie</del> NEWCOMB</u> | <u>"</u>                            |
| 5. |                                    | <u>"</u>                            |
| 6. |                                    | <u>SAME AS Above</u>                |

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED on or About  
MARCH 22nd 2008

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

\*\* GROUND ONE: Cruel + INJUST TREATMENT  
I'M a pre-trial Detainee,

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

See Exhibit "A"

GROUND TWO: \_\_\_\_\_

SUPPORTING FACTS: \_\_\_\_\_

GROUND THREE: \_\_\_\_\_

SUPPORTING FACTS: \_\_\_\_\_

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.  
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Appoint Me AN Attorney to Represent Me in this case  
PUNITIVE DAMAGES \$ 500,000  
CRUEL + UNJUST TREATMENT DAMAGES \$ 700,000  
Negligence + Comp~~A~~asitory DAMAGES \$ 500,000  
INJUNCTIVE RELIEF  
MENTAL ANGUISH DAMAGES \$ 500,000

Willie J. Clemmons  
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 4/1/2008  
(Date)

Willie J. Clemmons  
Signature of plaintiff(s)

Exhibit(1 of 4)  
"A"

ON or about the Month of March 22<sup>nd</sup>, 2008  
I willie James Clemons, JR was escorted up  
to the Nurse's station by %o Mattew, where  
Nurse Paula gave me My 3rd INMATE intake  
EXAM since being Incarcerated at autauga  
County jail, I told Nurse Paula to look at  
My Medical File and She would see that I've  
Already had (2) two intake EXAMS Already  
She Ignored the Comment and proceeded Anyway  
With her EXAM. After the EXAM she told Me to  
go out into the Hallway with the Rest of  
the Waiting INMATES, and she call %o Mattew  
into the Nurse's station to talk to her, And  
then %o Mattews came out and escorted, All  
of the INMATES back to the population Area  
to their Assigned cell pods, but when she,  
got to my cell pod she told me she was going  
to take me back up to the Nurse's station  
upon Returning to the Nurse's station  
About (10) ten feet from the Nurse's station  
she walk me over to the lockdown cells

And had the door open and she told me to go inside with two (2) other inmates, (Inmates Name (James) John Wood III, and Jerry Harris) And told me to get Butt-Naked because I was being put an Suicide Watch. And I told her I was not going to undress in front of a Woman, and I told her I was not going to kill myself again. And she said that Nurse Paula wanted me put on Suicide Watch. So Mattew left and went and got So Newcomb to come and order me to get Naked. I said I am not going to get Butt-Naked in front of (2) two Womens. So Newcomb order me to get Naked again I felt I had no choice so I got Naked and I stood in front of these (2) two Women guards, So Mattews started laughing at me standing there Butt-Naked, I was given a paper gown and lock-dowd with (2) two other inmates that had all of their personal belongings Blankets, clothes, sheets, socks, towel every thing.

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If the Nurse thought I was suicidal Why?  
Would I be put in a lockdown cell with  
INMates that have all of their personal  
Effects, John Wood III and Jerry Harris  
threatened to beat Me up, because I was  
Naked only wearing a paper gown they told  
% Stoude Mire, and % Villa to Move Me or  
they was going to beat Me up, and they didn't  
Move me, I was left to sleep on the Floor  
for (3) three days scared I was going  
to be beat up or kill by these Violent INMates  
that can't live AMongst the jail population.  
With out Fighting other INMates. I was  
scared for My life for (3) three days.

As I've Already Stated in Another pending  
Complaint I sustained A head and Neck  
injury that I've Never Received proper  
Medical treatment. I was force to sleep on  
the floor for (3) three days And my Condition  
has worsen. My paceMaker is Always acting  
up (Malfunction) I'M a 59 years old Man that  
was Humiliated by standing butt-Naked  
in front of two Women Guards, (watch) MRS.  
Matthew Started Laughing at Me

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Standing there butt-Naked, ~~Expo~~ Exposed.  
And then put in lock down for no reason  
at All But to Exert(e) their position of  
Authority on a defenseless pre-trial Detainee  
As the Honorable Court Already Knows I AM  
Indigent and My status has not changed.

I Certify that I've follow the Autauga jail  
policy on Exhausting the jail Remedies  
I submitted Grievance's to the Jail Staff  
And Herbie Johnson Sheriff of Autauga County  
Jail on 3/25/2008.

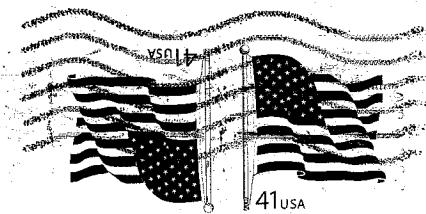
Willie J. Clemmons  
WILLIE J. CLEMMONS

4/1/2008

MR. Willie James Clemmons JR  
136 N. Court St  
PRATTVILLE AL 36067-3002

MONTGOMERY AL 361

01 APR 2006 PM 11



Legal Mail  
Enclosed

**INMATE MAIL  
AUTAUGA METRO JAIL**

HON. Debra Hackett  
UNITED STATES DISTRICT COURT  
P. O. BOX 711  
Montgomery, AL 36101-0711

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